

JUDGE SWEET

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

08 CV 4990

-----x
JULIA JONES

Plaintiff,

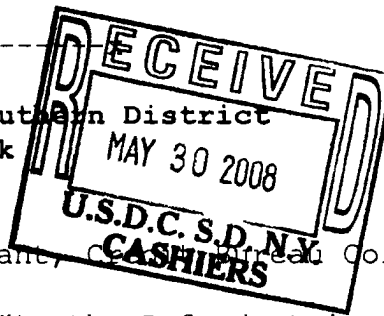
v.

CREDIT BUREAU COLLECTION SERVICES, INC.
S/H/A CBCS, VERIZON COMMUNICATIONS

**NOTICE OF REMOVAL OF
A CIVIL ACTION
PURSUANT TO 28 U.S.C.
§1441 et. seq.**

Defendants.

To: Clerk Of The Court Of The Southern District
Southern District of New York



NOTICE IS GIVEN that defendant, Credit Bureau Collection Services, Inc. s/h/a CBCS ("CBCS"), the Defendant in the civil action in the Civil Court of the City of New York, County of New York (index No. 024199 CVN 2008) hereby files this Notice of Removal to the United States District Court for the Southern District of New York, 500 Pearl Street, New York, New York 10007, pursuant to 28 U.S.C Sections 1441 and 1446. A true copy of the State Court Notice of Removal of Civil Action is attached hereto as Exhibit "A" and is incorporated herein by reference. A true and correct copy of Plaintiff's Amended Summons with Endorsed Complaint is annexed hereto as Exhibit "B".

This is a civil action pursuant to which the district court has original jurisdiction under 28 U.S.C. section 1331.

The United States District Court of the Southern District of New York has original jurisdiction of this matter based on the inherent power of this Court to hear cases involving civil actions arising under the laws of the United States. The basis of this jurisdiction is provided in Section 1331 of Title 28 of the United States Code entitled "Federal Question". This section states, in pertinent part, that the district courts shall have original jurisdiction of all civil actions arising under the laws of the United States. Based on the description of the nature and substance of the plaintiff's cause of action as set forth in the plaintiff's Endorsed Complaint, plaintiff is alleging violations of the Fair Debt Collection Practices Act of 1977, 15 U.S.C. sections 1692 - 1692o.

Concurrently with the filing of this Notice of Removal, defendant CBCS is giving notice to plaintiff and co-defendant Verizon Communications of this removal and the fact that this case is to be docketed in this Court and that this Court will grant relief to defendant CBCS as is proper under the circumstances.

Pursuant to 28 U.S.C. Section 1446(a) all pleadings (Amended Summons with Endorsed Complaint) that have been served to date in this matter are annexed to this Notice of Removal as Exhibit "B".


Wherefore, this Court should accept jurisdiction of this action and place it on this Court's docket for further proceeding as though it had been originally commenced in this Court.

Dated: New York, New York
May 29, 2008

Yours, etc.,

HOEY, KING, TOKER & EPSTEIN
Attorneys for Defendant
**Credit Bureau Collection
Services, Inc. s/h/a CBCS**
Office and Post Office
Address
55 Water Street, 29th Floor
New York, New York 10041-2899
(212) 612-4200

By:


David Kasdan (5589)

To:

Julia Jones
Plaintiff Pro Se
441 Convent Avenue-1st Floor
New York, New York 10031

Verizon Communications
Defendant
140 West Street
New York, New York 10007

Exhibit A

CIVIL COURT OF THE CITY OF NEW YORK
COUNTY OF NEW YORK

-----x Index No.: 024149 CVN
JULIA JONES 2008

Plaintiff,

v.

CBCS, VERIZON COMMUNICATIONS

**NOTICE OF FILING OF
NOTICE OF REMOVAL**

Defendants.
-----x

**To: The Clerk Of The Civil Court of the City of New York
County of New York**

PLEASE TAKE NOTICE, that Defendant, Credit Bureau
Collection Services, Inc. s/h/a CBCS ("CBCS") has filed a Notice
of Removal of this action in the United States District Court
for the Southern District of New York dated May 29, 2008,
pursuant to the provisions of 28 U.S.C. § 1441 and 1446. A copy
of said Notice of Removal is annexed hereto as Exhibit "A".
This notice is filed pursuant to 28 U.S.C. §1446(d).

No prior application for the same or similar relief has
been made to this or any other Court.

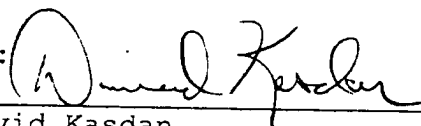
WHEREFORE, notice is given that defendant Credit Bureau
Collection Services, Inc. s/h/a CBCS has taken the appropriate
steps to have this action removed from the Civil Court of the

City of New York, County of New York to United States District
Court for the Southern District of New York.

Dated: New York, New York
May 29, 2008

Yours, etc.,

HOEY, KING, TOKER & EPSTEIN
Attorneys for Defendant
**Credit Bureau Collection
Services, Inc. s/h/a CBCS**
Office and Post Office
Address
55 Water Street, 29th Floor
New York, New York 10041-2899
(212) 612-4200

By: 
David Kasdan

To:

Julia Jones
Plaintiff Pro Se
441 Convent Avenue-1st Floor
New York, New York 10031

Verizon Communications
Defendant
140 West Street
New York, New York 10007

Exhibit B

JULIA JONES

Plaintiff

- AGAINST -

CBCS

VERIZON COMMUNICATIONS

Defendants

AMENDED SUMMONS WITH

ENDORSED COMPLAINT

BASIS OF VENUE IS:
PLAINTIFF'S ADDRESS

PLAINTIFF(S) ADDRESS:

JULIA JONES, 441 CONVENT AVE, APT 1F, NEW YORK NY 10031

To the above named defendant(s):

CBCS

250 EAST TOWN STREET
COLUMBUS, OH 43215

VERIZON COMMUNICATION
140 WEST ST
NEW YORK NY 10007

SUMMONS

YOU ARE HEREBY SUMMONED to appear in the Civil Court of the City of New York, County of New York, at the office of the Clerk of the said Court at 111 Centre Street in the County of New York, City and State of New York, within the time provided by law as noted below, * and to file your answer to the summons with the Clerk. Upon your failure to answer, judgement will be taken against you for the sum of \$25,000.00 with interest thereon from 01/01/06, together with the costs of this action.

Date: April 25, 2008

By: Jack Baer

Chief Clerk, Civil Court

ENDORSED COMPLAINT

The nature and substance of the plaintiff's cause of action is as follows:

CBCS/MCI NOW VERIZON COMMUNICATIONS REPORTED ME TO ALL THREE CREDIT BUREAUS, CAUSING MR TO PAY HIGHER INTEREST RATE ON LOAN. REPORTED FALSE INFORMATION, INCORRECT DATA.

***Note to the Defendant**

A) If the summons is served by its delivery to you personally within the City of New York, you must appear and answer within ~~TWENTY~~ days after such service; or

B) If the summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed ~~THIRTY~~ days after the proof of service of this summons is filed with the Clerk of this Court within which to appear and answer.

C) Following CPLR 321(a) corporations must be represented by an attorney.

- NOTE TO THE SERVER OF THE SUMMONS -

The person who serves the Summons should complete the Affidavit of Service and file it in the Clerk's Office within **FOURTEEN DAYS** after service of the Summons on the defendant.

PLAINTIFF'S CERTIFICATION
(SEE NYCRR, SECTION 130-1.1a)

SIGN NAME

X

Julia Jones

PRINT NAME

Julia Jones